



Brett H. Klein, Esq., PLLC  
305 Broadway, Suite 600  
New York, New York 10007  
T: (212) 335-0132 F: (212) 335-0571

September 28, 2023

**BY ECF**

The Honorable Arun Subramanian  
United States District Judge  
500 Pearl Street  
New York, New York 10007

Re: *Morales, et al. v. City of New York, et al.*, 21 CV 7332 (AS)

Dear Judge Subramanian:

I represent the plaintiffs in the above-referenced civil rights action. I write jointly with all counsel to respectfully request an adjournment of the in-person case management conference scheduled for September 29, 2023 at 10 a.m. to a date after the close of discovery.

As the Court may recall, the parties recently requested, and the Court granted, an enlargement of the fact and expert discovery deadlines (ECF Doc. 95). Given that fact discovery is due by December 21, 2023, and expert discovery is due by February 24, 2024, we jointly request that the case management conference be rescheduled to a date and time that is convenient for the Court after the close of discovery.

For the avoidance of doubt, the parties are cooperatively engaged in discovery and in taking steps to schedule a settlement conference before Magistrate Judge Cott, and presently have no disputes necessitating judicial intervention.

We are mindful of the Court's two-day rule for adjournments, and thus apologize for any inconvenience.

Thank you for your consideration.

Respectfully,

*Brett Klein*

Brett H. Klein

cc: All Counsel      The parties' motion is GRANTED. The conference is rescheduled to February 26, 2024 at 11 AM. The parties are reminded to promptly bring any discovery disputes before the Court, as the Court is unlikely to grant further extensions of the discovery deadlines.

The Clerk of Court is directed to terminate the motion at ECF No. 99.

SO ORDERED.

Arun Subramanian, U.S.D.J.  
Date: September 28, 2023